

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 1:18 CR 513
	)	
Plaintiff,	)	JUDGE CHRISTOPHER A. BOYKO
	)	
vs.	)	
	)	
TREVOR C. MARLYNE,	)	<b><u>MOTION TO CONTINUE</u></b>
	)	
	)	
Defendant.	)	

Now comes Defendant, Trevor Marlyne, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for a continuance of the pretrial scheduled for Tuesday, February 5, 2019 at 10:00am and trial scheduled for Tuesday, February 12, 2019 all for the reasons set forth below

Respectfully submitted,

/s/ Eric F. Long  
ERIC F. LONG (0093197)  
ERIC C. NEMECEK (0083195)  
Counsel for Defendant  
Friedman & Nemecek, L.L.C.  
1360 East 9<sup>th</sup> Street, Suite 650  
Cleveland, OH 44113  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion was filed by CM/ECF on the 22<sup>nd</sup> day of January, 2019, which will send a notification of such filing electronically to the following: Assistant United States Attorney Aaron Howell, 801 West Superior Avenue, Cleveland, Ohio 44113.

Respectfully submitted,

/s/ Eric F. Long  
ERIC F. LONG  
Counsel for Defendant

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TREVOR C. MARLYNE,	)	
	)	
Defendant.	)	

**MEMORANDUM**

On October 17, 2018, this court declared this case complex (Doc.#73).

Undersigned counsel has exercised great care in reviewing the discovery disclosed to date, however discovery is ongoing. Due to the fact there is ongoing discovery in this matter, it is unreasonable to expect adequate preparation for pretrial and trial itself as presently scheduled. Defendant respectfully requests that the pretrial and trial be continued for at least thirty days.

Defendant submits that the failure to grant a continuance would result in a miscarriage of justice and would deny counsel the reasonable time for effective preparation. Additionally, undersigned counsel has spoken to the AUSA in this matter and has no objection to the continuance requested herein.

Therefore, Defendant asks this court to grant this continuance of the pretrial and trial for a least 30 days.

Respectfully submitted,

/s/ Eric F. Long

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